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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
Implementation and Administration, and  
Consider Further Development of, California  
Renewables Portfolio Standard Program

Rulemaking 15-02-020  
(Filed February 26, 2015)

**MOTION OF THE LARGE-SCALE SOLAR ASSOCIATION TO AMEND THE  
2016 RPS PLANS RULING**

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June 7, 2016

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Pursuant the Commission’s Rules of Practice and Procedure, the Large-Scale Solar Association respectfully requests this motion (“Motion”) to update the May 17th Assigned Commissioner and Administrative Law Judge’s Ruling Identifying Issues and Schedule for Review of 2016 Renewables Portfolio Standard Procurement Plans (the “Ruling”) to include responses to the questions in Table 1 of this Motion related to curtailment provisions, bidding practices and barriers to efficient and effective market participation of all resources.

**I. Rationale for Requested Change**

As the Commission evaluates how it will reach the 50% Renewable Portfolio Standard and overall climate goals, we are faced with taking a grid designed for and around fossil resources to one that effectively and efficiently utilizes renewable resources. The Commission and the CAISO have begun to address these issues by advancing multiple measures to make changes and improvements to long-standing market inefficiencies in order effectively integrate higher levels of renewable resources. These include the expansion of the Energy Imbalance Market, larger regional expansion, targeted electric vehicle charging and a variety of measures to

increase levels of economic bidding to maximize the ability for the market to utilize renewable output, to name a few. LSA is supportive of these efforts, including those aimed at incentivizing economic bidding and reducing self-schedules, particularly from gas imports, which are contributing to oversupply conditions by continuing to import during times of high in-state solar production.

What has been missing to date is information on how renewables are being managed and the barriers scheduling coordinators (generally the utilities) are faced with today in efficiently scheduling both renewables and other resources. These issues are in need of additional Commission focus in this proceeding as they are critical for market participants and all parties to better understand, assess and manage risks of curtailment. The need for greater understanding and transparency of what is happening today as evidenced by the motion last week by the California Biomass Energy Alliance, California Wind Energy Association, Calpine Corporation, Geothermal Energy Association and Ormat Nevada, Inc. (“Joint Parties”) related to these same issues. We will respond to the Joint Parties’ Motion in turn but find generally prior to proposing solutions or approaches more information is needed on how utilities are dispatching both renewables and other resources. This information is also relevant to improving overall understanding of RPS compliance and the identification of effective and common sense improvements to the grid that ensure the best use of renewable resources.

## **II. Additional Information Requested**

The Ruling, in Section 6.9, directs utilities to report on curtailment frequency, forecasting and costs in addition to other actions and analysis. LSA strongly supports the continued reporting and greater transparency of this information. In addition, we request the Commission amend

Section 6.9 and direct the utilities to respond to a more specific set of questions related to how resources are participating the CAISO energy markets, what impact different curtailment provisions have on how resources are being bid and what the drivers and barriers are for different kinds of participation, as set forth in Table 1 below.

Table 1
1) What scheduling protocols are utilities using in the day-ahead and real-time markets?
2) Are utilities submitting economic bids for all contracts that have unlimited curtailment provisions in both the day-ahead and real-time markets? If not, why not?
3) How are utilities managing contracts with limited curtailment (e.g. 50 hours per year)? Are these projects being bid economically?
4) How are utilities bidding contracts with limited or no curtailment flexibility? Are they self-scheduled or bid economically?
5) What kinds of contract constraints limit the utilities' ability to submit economic bids into the market?
6) Pursuant to the California ISO over-generation protocol, self-schedules are cut pro rata if the ISO has insufficient economic bids to meet market conditions. What is the utility practice and protocol if / when a pro rata cut is issued to scheduling coordinators?

## Conclusion

LSA respectfully requests the Commission revise Section 6.9 of the Ruling to include the questions in Table 1, above.

Dated: June 7, 2016

Respectfully Submitted,

/s/ Rachel Gold  
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## VERIFICATION

I, Rachel Gold, am the Policy Director of the Large-scale Solar Association. I am authorized to make this Verification on its behalf. I declare that the statements in the foregoing copy of the *Motion Of The Large-Scale Solar Association To Amend The 2016 RPS Plans Ruling* are true of my own knowledge, except as to the matters, which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 7, 2016 at Berkeley, California.

/s/ Rachel Gold  
Rachel Gold  
Policy Director  
Large-scale Solar Association